

1. The existing firewalls are adequate. It is not feasible to implement such a massive and expensive program based upon a potential rare exception. As proven with the one case of BSE in the US, a tracking system for imported livestock would have provided the hoped for results.
2. The end result of the program will be elimination of small producers just as have been done to the small dairies, chicken operations, hog producers, and other small operators.
3. To meet the program's objectives, all animals must be ID before moving from any premise to another. Considering the myriad of possibilities this is not feasible.
4. **Tagging Sites:** The additional expense of hauling cattle to off site locations or having a service come to a small producer's location will be a severe burden. Many producers will not even take animals to a vet clinic or have the vet to come to their place to work calves even though it adds value. How do we staff such a site with such fluctuations of demands? The input into the database would show all animals at a premise on a given day, but the requirements only include animals that were at the location the same time of day. Assume truck brings in a load with multiple owners, the cohorts began to multiply quickly, then the producers enters receipt of animal back to their premises where they reenter the original herd—some of which have never left premise nor have been entered into database—unidentified cohorts now exist.'
5. **Receipt of Cattle at Auction:** Assume untagged and tagged animals to be received: with any kind of volume, it will be necessary to duplicate facilities and manpower. To avoid long delays at receiving pens the tagged animals would go one way, untagged animals another where they could be restrained for tagging. This introduces additional exposure for injury to animals and employees. Who is liable for compensation—added expense of increased insurance premiums?

Assume the auction market is successful in having producers bring in cattle to be tagged prior to sale day, i.e. for Monday sale, the cattle will be brought in on Friday, Saturday, and Sunday. By Monday, the unweaned calves will be breaking and shrinkage will be significant. The buyers are unhappy, the sellers are unhappy, and auctions will have to increase charges to recover additional expenses—or go out of business along with the many small producers.

6. **Responsibility for getting data into system:** In Texas, the auctions/state animal staff insures blood test results for mature animals are entered into the state's database. Logically, the auctions or other points of entry would be the ones to enter data into the date bank. Details as to how to handle situations where producers do not have premise numbers will need to be worked out. Also situations such as a broker that buys from 3-4 different auctions on Friday and Saturday, takes them to a premise where they are mixed with others, and shipped to various customers.

A common situation is for a trucker to pick up cattle from an auction sale, take part of the load to another auction, continues to an end user—continues to the 3<sup>rd</sup> and 4<sup>th</sup> location delivering the cattle.

How do we insure compliance—is the truck a premise or the auction from where they were shipped—how many cohorts now?

7. The plan itself is not realistic. We seem to be using Europe as the model yet the demographics are not even on the same planet.
8. Type of entity is the determining factor. For most auction markets, the Internet seems to be most efficient.
9. With the Freedom of Information Act and illegal hackers, the confidentiality issue seems to be overblown. What data is confidential today?

Private versus Government System:

A private, for profit or a coop with firm administrative cost parameters, offers best chance for a cost efficient system. We do not need another government bureaucracy.

1. **Funding:** This is much like taxation without representation. Funding should be provided by those entities that claim there will be benefit from the program. Eventually the cost will be passed onto the consumer.
2. Interfacing multiple databases is an expensive process. Who controls format and access—how would we know which database to access, etc.
3. Creates duplicate costs for overhead and infrastructure.
4. Depends upon capacity of provider. The sheer volume of actively would likely overload a single operation.